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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

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UNITED SERVICES AUTOMOBILE  
ASSOCIATION,

Plaintiff,

vs.

TALLY HO FARM, LLC, a Utah limited  
liability company; and B.H., a minor individual,

Defendants.

**STIPULATION FOR SECOND  
AMENDED COMPLAINT FOR  
DECLARATORY RELIEF**

Case No. 2:21-cv-00665-BSJ

Judge Bruce S. Jenkins

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TALLY HO FARM, LLC, a Utah limited  
liability company,

Cross-Claimant,

vs.

B.H., a minor individual,

Cross-Claim Defendant.

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TALLY HO FARM, LLC, a Utah limited  
liability company

Third-Party Plaintiff,

vs.

DAVID KIM, an individual; and REBECCA  
KIM, an individual.

Third-Party Defendants.

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Pursuant to F. R. Civ. P. 15(a)(2), the parties hereby provide written consent to United Services Automobile Association (“USAA”) amending the complaint as reflected in **Exhibit A** to this Stipulation. The Second Amended Complaint will be filed separately by USAA. With this stipulation, the Defendants Tally Ho Farm, LLC, and B.H., and the Third-Party Defendants David Kim and Rebecca Kim, make no concessions about the substance of the amendments, and Defendants and Third-Party Defendants will have the opportunity to address the amendments in a responsive pleading.

**DATED** this 10<sup>th</sup> day of February, 2023.

**GOEBEL ANDERSON PC**

/s/ Jennifer H. Mastrorocco  
Jennifer H. Mastrorocco  
*Attorney for Plaintiff*

**STIPULATED AND AGREED TO:**

**DATED** this 10<sup>th</sup> day of February, 2023.

/s/ Bruce C. Burt  
Bruce C. Burt  
*Attorneys for Tally Ho Farms, LLC*  
*(Signed electronically with permission)*

**DATED** this 10<sup>th</sup> day of February, 2023.

/s/ Ryan J. Schriever  
Ryan J. Schriever  
A. Andrew Penrod  
*Attorneys for Defendant B.H.*  
*& Third-Party Defendants David Kim and*  
*Rebecca Kim*  
*(Signed electronically with permission)*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 10<sup>th</sup> day of February, 2023, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to the following:

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& Third-Party Defendant Rebecca Kim*

/s/ Jennifer H. Mastrorocco